

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN, KEVIN SPRUILL,
ROTESHA MCNEIL, QIANA ROBERTSON,
YOUSEF JALLAL, MESSIEJAH BRADLEY,
PAULINO CASTELLANOS, ROBERT LEWIS
AND ALLEN SIFFORD, on behalf of
themselves and all others
similarly situated,

Plaintiffs,

v.

WILLIE R. ROWE, in his capacity as
Sheriff of Wake County, BRIAN
ESTES, in his official capacity as
the Sheriff of Lee County, THE
OHIO CASUALTY INSURANCE COMPANY,
as the surety for the Sheriff of
Wake County and as surety for the
Sheriff of Lee County, TYLER
TECHNOLOGIES, INC., NORTH CAROLINA
ADMINISTRATIVE OFFICE OF THE
COURTS, RYAN BOYCE, in his
official capacity as the Executive
Director of the North Carolina
Administrative Office of the
Courts, BRAD FOWLER, in his
official capacity as the ecourts
Executive Sponsor and Chief
Business Officer of the North
Carolina Administrative Office of
the Courts, BLAIR WILLIAMS, in his
official capacity as the Wake
County Clerk of Superior Court,
SUSIE K. THOMAS, in her official
capacity as the Lee County Clerk
of Superior Court, JOHN DOE

TYLER TECHNOLOGIES, INC.'S
CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO FIRST
AMENDED COMPLAINT

SURETY, as the surety for the Wake County Clerk of Superior Court and the Lee County Clerk of Superior Court, and DOES 1 THROUGH 20, INCLUSIVE,

Defendants.

Pursuant to Local Rule 6.1(a) and Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Tyler Technologies, Inc. ("Tyler Technologies"), moves this Court for an extension of time, through and including January 16, 2024, to answer or otherwise respond to Plaintiffs' First Amended Complaint - Class Action ("First Amended Complaint"). The requested extension will align Tyler's response date with the response date of a number of other defendants in the case. In support of this motion, Tyler Technologies states the following:

1. Plaintiffs filed their original complaint on May 23, 2023.
2. Tyler Technologies timely filed its Motion to Dismiss the Complaint on September 20, 2023.

3. Plaintiffs filed their First Amended Complaint on October 27, 2023. The original response date was November 13, 2023.

4. Tyler Technologies filed a motion for an extension of time to respond to the First Amended Complaint on November 2, 2023. Plaintiffs consented to this extension, and the Court granted Tyler Technologies' motion extending the deadline to respond to the First Amended Complaint through and including December 13, 2023.

5. The time within which Tyler Technologies must answer or otherwise respond to the First Amended Complaint has not expired.

6. Since that time, five of the six new defendants added in the First Amended Complaint have waived service, giving them a response date of January 16, 2024. (ECF Nos. 39-43).

7. Tyler Technologies requests an extension of time to align its response date with that of the new defendants. The requested extension will align the schedule in the case to the maximum extent possible and facilitate judicial economy.

8. This Motion is made in good faith and not for the purpose of undue delay.

9. Tyler Technologies' counsel has conferred with the Plaintiffs' counsel, and Plaintiffs' counsel consents to the requested extension.

10. Tyler Technologies reserves all defenses, claims and arguments.

WHEREFORE, Tyler Technologies respectfully requests the Court extend Tyler Technologies' deadline to answer or otherwise respond to the First Amended Complaint, through and including January 16, 2024.

[Signature on Following Page]

This 30th day of November, 2023.

s/ Gregory L. Skidmore
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